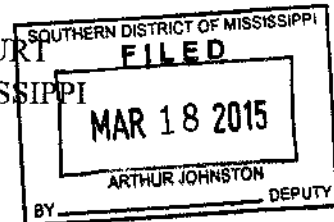


IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. *1:15cr22LG-RHW*

LUIS MANUEL CRUZ-GONZALEZ  
EDGARDO BATIZ MEDINA

18 U.S.C. § 1028A  
18 U.S.C. § 1028(f)

**The Grand Jury charges:**

COUNT 1

On or about March 2, 2015, in Jackson County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendants, **LUIS MANUEL CRUZ-GONZALEZ and EDGARDO BATIZ MEDINA**, did knowingly transfer without lawful authority a means of identification of another person, during and in relation to false representation of United States citizenship as prohibited by Section 911, Title 18 United States Code.

In violation of Section 1028A, Title 18, United States Code.

COUNT 2

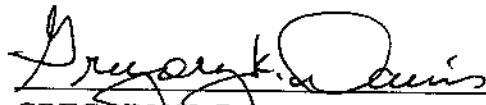
That beginning In or about January 2015 and continuing through on or about March 2, 2015, in Jackson County in the Southern Division of the Southern District of Mississippi and elsewhere, the defendants, **LUIS MANUEL CRUZ-GONZALEZ and EDGARDO BATIZ MEDINA**, knowingly and willfully attempted and conspired and agreed together and with each other, and with other persons both known and unknown to the grand jury to knowingly possess with intent to use unlawfully or transfer unlawfully five or more identification documents, authentication features, or false identification documents which appeared to be issued by or under the authority of the United States, as prohibited by 18 United States Code Section 1028(a)(3), (b)(1).

All in violation of Section 1028(f), Title 18, United States Code.

**NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE**

As a result of committing the offenses as alleged in this Indictment, the defendants shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendants, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Sections 982(a)(2)(B) and 1028(b), Title 18, United States Code.

  
GREGORY K. DAVIS  
United States Attorney

A TRUE BILL:

Redacted Signature  
Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 18<sup>th</sup> day of MARCH, 2015.

  
UNITED STATES MAGISTRATE JUDGE